Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Amendment of Parts 2, 25, and 73 of the Commission's Rules to Implement Decisions from the World Radiocommunication Conference (Geneva, 2003) (WRC-03) Concerning Frequency Bands Between 5900 kHz and 27.5 GHz and to Otherwise Update the Rules in this Frequency Range	)	ET Docket No. 04-139

Comments on Notice of Proposed Rule Making (NPRM)

Introduction

These comments are submitted on behalf of the National Association of Shortwave Broadcasters ("NASB"), which represents nineteen FCC-licensed, privately owned shortwave broadcast stations located in the United States.[1]

Through its Notice of Proposed Rule Making (NPRM) in the above Docket, the Commission announces its intention to make certain rule changes and seeks comments related to those changes.

Discussion

1. Regarding the proposal to add modified footnote 5.134 to the U.S. Table similar to the requirements in all other HFBC bands which would require the use of seasonal planning for the WARC-92 HFBC bands, as codified in Article 12 of the ITU Radio Regulations, the Association states the following:

The Association concurs with the Commission's proposal as stated in paragraph 17 of the NPRM.

[1] KSDA; WMLK; WEWN; WYFR; KFBS; WTJC; WBOH; WHRI; KWHR; WHRA; WRMI; KTWR; KAIJ; KVOH; WJIE; KNLS; WINB; WBCQ and WSHB.

2. Regarding the proposal to revise Section 73.751 to codify these minimum operating powers for SSB and digital systems, (See Appendix A for the proposed language for revised Section 73.751) the Association states the following:

The NASB agrees that single sideband transmissions should be authorized with a minimum 50 kilowatts of peak envelope power (PEP), since this provides approximately the same coverage area as a 50-kilowatt carrier power for an analog double sideband HF transmission. NASB also agrees that with digital transmissions, a lower rated transmitter output power can serve the same geographic area as a higher power analog signal, so NASB agrees that the minimum power for digital DRM transmissions should be lower than 50 kilowatts. However, NASB disagrees that an average power of 20 kilowatts for DRM transmissions would provide approximately the same coverage area as a 50-kilowatt analog transmission. Numerous authorities, including the DRM Consortium, have indicated that DRM transmissions should be at least 7 dB below the equivalent analog power.[2] Thus, 7 dB down from 50 kilowatts would be 9.976 (nominally 10) kilowatts, so NASB believes that the minimum power for DRM transmissions should be 10 kilowatts.

3. Regarding the proposal to add to Commission rules the ITU requirements for DSB, SSB, and digital HFBC systems, which are listed in revised Appendix 11 of the ITU Radio Regulations, (The specific language of the Commission proposal is presented in Appendix A, Section 73.756.) the Association states the following:

NASB supports the authorization of single sideband and digital transmissions in the high frequency broadcasting service bands, and NASB supports the reallocation of 7350-7400 kHz to the HF broadcasting service.

Further, NASB agrees that U.S.-licensed international broadcast stations should have the flexibility to transmit analog double sideband (DSB) signals, single sideband (SSB) signals or digital signals in all of the frequency ranges allocated to this service. NASB believes that the Digital Radio Mondiale (DRM) standard should be the required standard for digital HFBC transmissions.

NASB agrees with the specifications for HF broadcasting as indicated in the revised Section 73.756, and emphasizes that in order for digital transmissions to co-exist along with double sideband and single sideband transmissions in the same frequency bands without undue interference, it will be necessary for the power of the DRM transmissions

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[2] See Broadcasters' User Manual, published by Digital Radio Mondiale (DRM) Consortium, first edition, March 2004, page 47, chapter 6.4: "Under current coordination procedures, [HF] DRM transmissions may be introduced under similar principles to that in the MW bands. That is the service is first coordinated as if it were an analogue DSB service and then a DRM transmission substituted with a power level at least 7 dB lower than the allowable analogue transmission."

to be several dB lower than that which is currently used for DSB and SSB emissions, i.e., specifically a minimum of 7 dB lower.

4. Regarding the request for comment on whether the DRM standard should be required for digital transmissions, (NPRM observes that broadcasting, unlike many other radiocommunication services, is a mass media service and that for such a service, standards are often useful.) the Association states the following:

The Association believes that the DRM standard should be the required standard for digital transmissions.

5. Regarding the specific request for comment on whether Commission Rules should require the inclusion of the capability to offer digital modulation in all new HFBC transmitters put into service after the effective date of the Report and Order in this proceeding, the Association states the following:

The Association believes it is unwise and unnecessary to require inclusion of the capability to offer digital in all new HFBC transmitters because the manufacturers already are building in provisions for digital modulation. Thus, the requirement is unnecessary.

Conclusion

The NASB agrees with all of the FCC's proposals in this NPRM relating to HF broadcasting, with the important exception that the minimum power level for DRM transmissions should be 10 kilowatts instead of 20 kilowatts.

Respectfully Submitted,

NATIONAL ASSOCIATION OF SHORTWAVE BROADCASTERS